**3/25/2025**

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**To: Massachusetts Department of Public Health**

**Subject:** Opposition to the Limited Scope Radiography Licensure (105 CMR 125.00) – March 26, 2025

Dear Members of the Massachusetts Department of Public Health,

My name is Nevan O’Brien, and I am a graduating Radiologic Technology student from North Shore Community College. I am submitting this written testimony in opposition to the implementation of proposed amendments to 105 CMR 125.000 Licensing of Radiologic Technologists scheduled for March 26, 2025.

I oppose these changes due to concerns about radiation safety, practicality, and what the training and education may lack. A licensed Radiographer that has completed schooling with an Associate’s degree has a vast wealth of knowledge than a limited licensed tech would. In theory, it would make sense to have a limited license take in an urgent care environment, however, with the proposed Scope of Practice the radiographers would be far too limited since the most common exams are Chest and Abdomens. If you have two techs that have different body parts in their scope of practice and one calls out what will happen? If the tech that does chest X-Rays calls out will the center no longer provide chest X-Rays that day? A limited license program seems like it will be cutting corners to get more people taking X-Rays faster and cheaper

There are too many outliers for this to be passed at this time. These techs being limited to 2 body parts and not being allowed to image Abdomens simply does not make sense in an urgent care environment. This license being so limited will require centers to hire multiple techs which defeats the whole purpose of limiting your X-Ray techs. It makes more sense to hire a Radiographer who has a license to examine the whole body rather than 2-3 techs that can only image two body parts.

Massachusetts is known for its high standards in patient care. Lowering qualifications for individuals performing X-ray exams risks compromising the safety and effectiveness of diagnostic imaging. I stand in full support of the Massachusetts Society of Radiologic Technologists (MSRT) and their recommendations to uphold strong professional standards for radiologic imaging.

I urge the Department of Public Health to carefully consider these concerns and ensure that any changes to radiologic licensing regulations prioritize patient well-being and maintain the integrity of our profession.

Sincerely,